



Matthew S. Trokenheim | Partner
Direct 973.681.7024 | mtrokenheim@goldbergsegalla.com

April 8, 2022

The requests are granted. So ordered.

/s/ Alvin K. Hellerstein

April 11, 2022

VIA ECF

Hon. Alvin K. Hellerstein
United States District Court, Southern District of New York
United States Courthouse
500 Pearl Street
Room 1050
New York, New York 10007

Re: *Zioness Movement, Inc. v. The Lawfare Project, Inc.*
S.D.N.Y. Case No. 1:21-cv-07429-AKH

Dear Judge Hellerstein:

I write on behalf of The Lawfare Project, Inc. (“Lawfare”), defendant and counterclaimant in the above-reference matter, and with the consent of Plaintiff Zioness Movement, Inc. (“Zioness”), to request the permanent sealing of a document filed yesterday on the docket at Doc. No. 29, and for permission to replace with a redacted version.

On April 7, 2022, I filed on behalf of Lawfare a document containing an Answer to Zioness’s Complaint, Affirmative Defenses, Counterclaims against Zioness, and claims against a new party Amanda Berman. In the Counterclaims section titled Parties, I unthinkingly included an allegation as to Ms. Berman’s alleged home address. Zioness’s counsel immediately asked me to remove the home address from the public docket, to which I immediately agreed to attempt to do. The Clerk’s office temporarily sealed the document at my request, and instructed me to file a request with Your Honor that the document be permanently sealed, and that Lawfare be permitted to file a replacement document.

By this letter, Lawfare requests, with the consent of Zioness, that Doc. No. 29 be sealed, and that Lawfare be permitted to file a version redacting Ms. Berman’s alleged home address.

Thank you in advance for your consideration of this matter.

Please send mail to our scanning center at: PO Box 880, Buffalo NY 14201

Hon. Alvin K. Hellerstein

April 8, 2022

Page 2

Respectfully submitted,

GOLDBERG SEGALLA LLP

/s/ Matthew S. Trokenheim
Matthew S. Trokenheim

MST:

To: All Parties via ECF

Amanda Berman (via email)
c/o Rosanne Felicello